

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

ROBERT LEE RUSZKOWSKI, JR., DANA
RENEE GRIFFITH, and JILL KATHLEEN
KING,

Plaintiffs,

v.

DALE JAMES MORGADO,

Defendant.

Case No. 18-CV-5754

Honorable Sharon Johnson Coleman

STATUS REPORT

Plaintiffs ROBERT LEE RUSZKOWSKI, JR., DANA RENEE GRIFFITH, and JILL KATHLEEN KING, by and through their attorneys, Actuate Law LLC, hereby submit a status report to the Court:

NATURE OF THE CASE

I. Parties

- a.** Plaintiffs Robert Lee Ruszkowski, Jr., Dana Renee Griffith, and Jill Kathleen King are represented by Dara C. Tarkowski (lead trial attorney) and Andrea C. Halverson (trial attorney) at Actuate Law, LLC.
- b.** Defendant Dale James Morgado (“Morgado”) has not yet been served and is not yet represented by counsel.

II. Nature of the Claims

Plaintiffs have asserted one count of negligence against Morgado. Morgado is an attorney who is/was licensed to practice law in Connecticut, Florida, and New York. Morgado represented Plaintiffs in a District Court of Connecticut case, in which Plaintiffs sought a declaratory judgment

regarding pension payments made to them by the City of Stamford from their late mother's pension. After this federal suit was initiated, the City of Stamford sued each Plaintiff in their respective states of residence.

For more than a year, Morgado purported to represent each Plaintiff in these state cases, even though he was not licensed to practice in any of Plaintiffs' states of residence. Morgado billed Plaintiffs for filing his appearance, but never filed an appearance in any of the state cases. Morgado never appeared at any of the hearings on behalf of Plaintiffs, and wrongfully instructed Plaintiffs to not appear as well. Morgado's conduct directly caused: (i) default judgments to be entered against all three Plaintiffs; (ii) arrest warrants to be issued against two Plaintiffs; and (iii) the third Plaintiff's house to be subject to a sheriff's auction. At the same time, Morgado failed to respond to motions to dismiss in the D.C. Conn. case, which was dismissed for Morgado's failure to prosecute.

III. Relief Sought by Plaintiffs

As a direct and proximate cause of Morgado's negligent conduct, Plaintiffs have suffered damages in excess of \$100,000.

IV. General Status of the Case

Plaintiffs filed the Complaint on August 22, 2018. Defendant Dale James Morgado has not yet been served. Below is a summary of the various service attempts. Plaintiffs have attempted service via certified mail and/or process servers at every address they have identified as being potentially related to Morgado. Plaintiffs plan to file a motion for alternative service with the Court once Plaintiffs receive the affidavits from each process server detailing the service attempts.

Plaintiffs have not been in contact with Morgado since at least May 2018. In an effort to serve Morgado, Plaintiffs' counsel: (i) ran a public records search; (ii) ran internet searches, (iii)

searched Pacer, and (iv) reviewed communications and documents from Morgado. To identify viable addresses, Plaintiffs' counsel first attempted service via certified mail, return signature requested, at the following addresses:

Connecticut Addresses

Address	Source	C.M. Sent	C. M. Returned
Dale James Morgado 65 Redding Road, Unit 60 Georgetown, CT 06892	Address provided to the Plaintiffs by Morgado	8/24/18	Return to Sender 10/28/18
463 Tresser Blvd. 9th Floor Stamford, CT 06109	Address provided on AVVO website	8/24/18	Return to Sender 9/04/18

Florida Addresses

Address	Source	C.M. Sent	C. M. Returned
Dale James Morgado 382 N.E. 192nd Street Unit 84164 Miami, FL 33132	Address included in Morgado's Engagement Ltr. / Bio.	8/24/18	8/30/2018
Feldman Morgado, PA 501 N. Reo Street Tampa, FL 33609	Address included on the Feldman Morgado, PA website	8/24/18	Return to Sender 8/31/2018
100 Biscayne Blvd Suite 2902 Miami, FL 33132-2301	Legal Directories Florida website	8/24/18	Return to Sender 9/7/2018

New York Addresses

Address	Source	C.M. Sent	C. M. Returned
Dale James Morgado 85 Wall Street, Suite 1100 New York, NY 10005	Address included on Florida, Connecticut, and New York Atty. Registration website	8/24/18	Return to Sender 8/31/2018
Feldman & Morgado, PA 14 Wall Street, 20th Floor New York, NY 10005	Address included on Yelp page for Feldman & Morgado, PA	8/24/18	Return to Sender 9/17/2018
Morgado, P.A. 600 Third Avenue, 2nd Fl. New York, NY 10016	Address used Pacer pleadings	8/24/18	Return to Sender 9/11/2018

Additionally, personal service has been attempted at each of the following addresses:

Connecticut Addresses

Address	Source	Personal Service Attempt Date	Personal Service
Dale James Morgado 19 Sugar Hollow Rd Wilton, CT 06897-4834	Residence listed on public records PeopleMap report	10/19-23/2018	No
Dale James Morgado 5 Minard Drive Westport, CT 06880-6422	Residence listed on public records PeopleMap report	10/19-23/2018	No
Dale James Morgado 30 Woodland Street, 6B Hartford, Ct 06105-2318	Residence listed on public records PeopleMap report	10/19-23/2018	No

Florida Addresses

Address	Source	Personal Service Attempt Date	Personal Service
Dale James Morgado 382 N.E. 192nd Street Unit 84164 Miami, FL 33132	Address included in Morgado's Professional Bio.	11/8/2018	No
Dale James Morgado 1333 95th St Bay Harbor Islands, FL 33154	Residence listed on public records PeopleMap report	10/16/2018	No
Morgado Legal PA 11713 Colony Lakes Blvd New Port Richey, FL 34654	Address for Morgado Legal PA on public records PeopleMap report	10/25/18 10/26/18	No

New York Addresses

Address	Source	Personal Service Attempt Date	Personal Service
Morgado, PA 228 Park Ave., #84164 New York, NY 10003	Address listed for Morgado, PA on Google Maps	11/7/18	No

November 8, 2018

Respectfully Submitted,

s/ Andrea C. Halverson

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